

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

City of Chicago,

Plaintiff,

v.

DoorDash, Inc. and Caviar, LLC,

Defendants.

Civil Action No. 1:21-cv-05162

Hon. Jeremy C. Daniel
Magistrate Judge Jeffrey T. Gilbert

JOINT STATUS REPORT

Pursuant to this Court's orders dated December 23, 2022 (ECF No. 90) and December 19, 2022 (ECF No. 87) directing the parties to file a status report seven days after each rolling production deadline to provide information about the last rolling production, what has been produced to date in total, and what remains to be produced, the parties hereby file this Joint Status Report concerning the May 17, 2024 production deadline.

I. Status of the City's Document Productions

A. Documents Produced by the City To Date

As of May 17, the City has produced 7,844 documents, totaling 56,849 pages, in rolling productions. The City's prior productions are described in more detail in the prior joint status reports (ECF Nos. 96, 101, 105, 109, 115, 151, 164, 174, 194, 200, 202, 216, 230, 234, 242, 246, 249, 250, 282, 294, 304, 308, 309).

The City's May 3, 2024 production contained 25 documents and 203 pages. This production contained documents responsive to the following, among others:

- RFP No. 41 (documentation relating to BACP Commissioner Escareño's determination that DoorDash had violated MCC § 2-25-090).
- Interrogatory No. 6 (test order documentation)

The City's May 9 production contained 4 documents and 4 pages. This production contained documents responsive to the following, among others:

- RFP No. 41 (documentation relating to BACP Commissioner Escareño's determination that DoorDash was violating MCC § 2-25-090)

The City's May 10 production contained 501 documents and 501 pages. This production contained documents responsive to the following, among others:

- RFP No. 109 (Documents relating to DoorDash's design elements)

The City's May 17 production contained 35 documents and 461 pages. This production contained documents responsive to the following, among others:

- RFP No. 110 (Guidance issued by BACP to its staff about conduct and/or procedures for consumer protection investigations, complaints or lawsuits)

B. Remaining Documents to be Produced

The City agreed to produce documents from hard copy files, and from agreed-upon custodial searches, in response to RFP Nos. 107, 114, and 116-120. The City is also reviewing and will produce the results of agreed-upon searches for RFP Nos. 43, 91, 92 and 97. The City continues to review its overall production for completeness. The City produced an updated privilege log on May 9. The City will supplement the log to reflect privileged documents identified in any future searches agreed to in the parties' discovery negotiations or directed by the Court.

II. Status of DoorDash's Document Productions

A. Documents Produced by DoorDash to Date

DoorDash made a production on May 10, 2024, which included productions of the majority of the requested Salesforce data relating to communications from consumers, restaurants, and Dashers; DoorDash organizational charts; and documents from certain listserv inboxes requested by the City. Since August 2022, DoorDash has produced a total of 7,668 documents and 39,161 pages across 26 productions. The documents produced to date include:

- Custodial documents responsive to the City's document requests relating to minimum amount promotional discounts, non-partner restaurants, Dasher pay, consumer fees, and menu pricing;
- Documents identified in known non-custodial locations;
- Documents identified from DoorDash's review of documents produced in related investigations and litigations; and
- Spreadsheets that were created in order to respond to the City's requests for specific data.

Additionally, DoorDash served its privilege log on the City on March 22, 2024.

B. Remaining Documents to be Produced

DoorDash is in the process of collecting, reviewing, and producing additional documents responsive to the City's RFPs, Set Five, served on March 15, 2024. DoorDash has also begun the process of collecting, reviewing, and producing additional documents responsive to agreements reached stemming from the meet-and-confers letters and meetings that occurred ahead of the Court's motion-to-compel deadline on May 15, 2024.

DATED: May 24, 2024

Respectfully submitted,

**CITY OF CHICAGO DEP'T OF LAW,
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